

February 15, 2002

Magalie Roman Salas
Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

RE: Public Notice DA 01-2932 -- (MM Docket No. 99-325) Comment on National Radio Systems Committee's "Evaluation of the iBiquity Digital Corporation IBOC System"

Introduction

Texas Instruments Incorporated ("TI") is submitting this comment pursuant to the Commission's Public Notice DA 01-2932 dated December 19, 2001. The Commission has sought comment on the above referenced report, conclusions and recommendations concerning the iBiquity hybrid mode FM IBOC DAB system. TI concurs with the report's conclusions and supports its recommendations.

Company Background

TI is a global semiconductor company and the world's leading designer and supplier of real-time signal processing solutions. Headquartered in Dallas, Texas, TI has more than 38,500 employees worldwide with corporate, sales and manufacturing facilities in more than 25 countries across Asia, Europe and the Americas.

Recognizing the potential of IBOC technology for DAB, TI has an equity investment in iBiquity. Assuming that the market develops to its potential, TI intends to commercialize a prototype DAB semiconductor device specifically targeted at IBOC applications. Market development depends in part on the adoption of suitable IBOC standards. Designation of a formal standard will facilitate prompt rollout of the technology by giving manufacturers some reassurance that investment in this technology will be rewarded. TI and iBiquity plan to commercialize the prototype chip for receiver manufacturers to embed in their products.

Benefit of IBOC

TI believes that NRSC's evaluation of iBiquity's FM system was thorough and impartial. The NRSC program was comprehensive and appeared to analyze all relevant aspects of the IBOC system. TI concurs with the NRSC conclusion that the iBiquity FM IBOC system as tested will offer FM broadcasters significantly enhanced performance over that which is presently available from traditional analog FM broadcasting, and that the tradeoffs necessary for the adoption of FM IBOC are relatively minor (NRSC Report, Section 2).

Conclusions and Recommendations

TI supports NRSC's conclusion that the Commission should promptly proceed with selection of IBOC as the digital radio solution for the United States. We urge the Commission to move swiftly and to find that the iBiquity system is an acceptable IBOC implementation.

Naresh Coppiseti
DAB Digital Radio Business Manager
Texas Instruments Incorporated
NareshCoppiseti@ti.com
281-274-3941